

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MARYLAND
(Greenbelt Division)**

In re)	
)	
Trudah A. Harding)	
)	No. 25-11103-MCR
Debtor.)	Chapter 13
_____)	

**APPLICATION FOR ORDER AUTHORIZING THE
EMPLOYMENT OF KEYONA WRAN OF KELLER WILLIAMS PREFERRED
PROPERTIES AS REAL ESTATE AGENT FOR THE DEBTOR**

Trudah A. Harding, (the "Debtor"), submits this application (the "Application") pursuant to section 327(a) of title 11 of the United States Code (the "Bankruptcy Code") and Federal Rule of Bankruptcy Procedure (the "Bankruptcy Rules") 2014(a) for an order authorizing the Debtor to employ and retain KEYONA WRAN of KELLER WILLIAMS PREFERRED PROPERTIES ("AGENT") as her Maryland REAL ESTATE AGENT in this chapter 13 case. In support of this Application, the Debtor respectfully represents to this Honorable Court as follows:

1. On February 10, 2025, this case was commenced by the filing of a voluntary petition for relief under chapter 13 of the Bankruptcy Code in the United States Bankruptcy Court for the District of Maryland (the "Bankruptcy Court").

2. The Debtor is a Maryland resident who owns a home in Montgomery County, Maryland that may need to be sold to pay creditors.

3. The Debtor desires to retain and employ AGENT pursuant to section 327(a) of the Bankruptcy Code and Bankruptcy Rule 2014(a) to perform REAL ESTATE services in these

proceedings.

4. The Debtor believes that AGENT is well-qualified to act on behalf of the Debtor, having ample experience in the sale of real estate of this nature.

5. As set forth in the Affidavit of KEYONA WRAN (the “Affidavit”), annexed hereto and made a part hereof, AGENT represents no interest adverse to the estate regarding the matters upon which she is to be engaged, and is “disinterested” as such term is defined in section 101(14) of the Bankruptcy Code. AGENT will not, while retained by the Debtor, represent any other party in interest in connection with this case.

6. AGENT does not have any connection with the Debtor (other than as her real estate agent), her affiliates, partners, creditors, or, any other party in interest, the United States trustee, or any person employed in the office of the United States trustee.

7. The employment of AGENT is in the best interests of the Debtor, her creditors and the estate.

8. AGENT will charge fees and expenses incurred in these proceedings based on the normal rates charged by AGENT for similar clients, i.e., a 3.5% + \$495 commission basis pursuant to a standard form listing agreement (6% if buyer is unrepresented). Compensation of the agent who procures a buyer, if other than AGENT, would be negotiated as part of the sale contract.

WHEREFORE, the Debtor requests that she be authorized to retain and employ KEYONA WRAN of KELLER WILLIAMS PREFERRED PROPERTIES as her Maryland real

estate agent with respect to this case pursuant to section 327(a) of the Bankruptcy Code and Bankruptcy Rule 2014(a), and for such other relief as the Court deems just and proper.

Dated: August 12, 2025.

Respectfully submitted,

/s/ Daniel M. Press
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CERTIFICATE OF SERVICE

This is to certify that on this 12th day of August, 2025, I caused the foregoing document to be served on upon the Chapter 13 Trustee and all parties requesting notice by CM/ECF, to:

Rebecca A. Herr ecf@ch13md.com

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/s/ Daniel M. Press